

## **REMARKS**

### **Claim Rejections – 35USC § 102**

Reconsideration is respectfully requested for Claims 1, 3-5, 8-10, 12, 15, and 16, said claims having been rejected under 35 USC 102(b) as being anticipated by U.S. Patent No. 4,678,209 to Guice. These rejections are respectfully traversed.

Applicant's die inserts and slips are used to grip pipe for such operations as, but not limited to, drilling, running and tripping tubulars, making up and breaking out tubulars, and handling tubulars around the rig area. Die inserts are used because they are less expensive to change out and a particular set of slips can be used for various size tubulars by just changing the dies and/or die inserts. Traditionally die inserts had a smooth back face which contacted the smooth face of the slip. These die inserts were bolted to the slips or were inserted in a groove or otherwise confined or attached to the slip or die. When the die inserts were loaded (i.e. a pipe was being gripped) the force of the pipe typically loaded a single point of the die insert at a single point on the slip. The Applicant has discovered that, by adding some type of texture to the back face of the die insert, the die insert will transfer load more uniformly across the surface contacting the slip. In turn, the load on the slips is distributed more evenly; thus, substantially lowering the possibility that any parts of the die, slips, or pipe handling equipment will fail due to entire loads being supported at just a few points.

Applicant respectfully submits that the Guice reference is non-analogous art. Guice is a casing hanger wherein element 20 moves downward relative to element 12. The teeth 34, of Guice, do not make contact with element 12 until the die 20 has moved a sufficient distance downward to fully grip the casing with teeth 32. Thus, the teeth 34, are between two moving parts and the teeth 34 are used to retard movement along the slip after element 20 has moved some

predetermined distance along element 12.

In sharp contrast, the Applicant's die insert 1 is not designed to freely slide along the slip some predetermined distance. Relative movement between the die insert and the slip is undesirable except when the insert is being changed out. Thus, the Applicant's gripping face 3 is **not between** two moving parts. The Applicant's gripping face is not to retard movement but to transfer load forces from the die insert to the slip.

Applicant respectfully brings to the Examiner's attention that although a casing hanger (Guice) and the gripping dies of the instant invention both grip oil field pipe strings, the design and function of each rests within entirely different design philosophies. In a casing hanger, the pipe gripping elements are designed to move in a downward direction, relative to the slip bowl to allow for the pipe gripping members to fully engage the pipe being gripped (see Guice - Col. 4, lines 15-35). Further, the front and back surfaces of Guice, **are not parallel**, and will not work if they were parallel. The slips of a casing hanger have a back face that is tapered to match the tapered surface of the slip bowl. Guice specifically teaches that the front teeth 32 are formed to create a serrated edge and extend between the opposing sides of the slip member (Col. 3, lines 57-65) while the back teeth 34 are profiled to radially vary in symmetry such that there are no teeth in the middle and the teeth are the largest at the edges (Col 3, line 66 - Col. 4 line 14). Thus, the Guice back teeth 34 do not grip the slip until after almost full movement of the pipe gripping section downward into the slip (see Col. 4, lines 26-31). Further, a casing hanger is a more permanent pipe gripping system as the hanger is used to set the casing and not typically during tripping of the pipe string.

In sharp contrast, as per Claims 1, 5, 12, 19, and 20, Applicant's front and back faces are **substantially parallel**. The Applicant's dies are designed so as to be easily changed out and are designed to typically fit in a retaining groove. Further, the Applicant's dies are typically used in

the tripping of pipe. Thus, the Applicant's dies contact and grip many tubulars as tubulars are added to, removed from, raised with, or lowered with a pipe string. A casing hanger typically only grips one tubular to support the pipe string. The Applicant's back textured surface, of the die, contacts the slip at substantially the same time that the front part grips the pipe. Thus, the front and back surfaces remain substantially parallel. Therefore, the Applicant's device is based on a philosophy of preventing substantially all slip and attempts to grip the pipe while **not** slipping along the slips. Further, per new Claim 19, it is clear that Applicant's textured surface is of a uniform nature as opposed to the size variation, from middle to edge, as taught by Guice and required for the Guice hanger to properly operate.

Therefore, it is respectfully submitted that Claims 1, 5, and 12 and Claims 3-4, 8-10, 15, and 16, which depend from Claims 1, 5, and 12 as well as new Claims 19 and 20 are patentable over the cited Guice reference and as such a favorable condition of such claims is respectfully requested.

#### Claim Rejections – 35USC § 103

Reconsideration is respectfully requested for Claims 2, 6, 7, 13, and 14, said claims having been rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 4,678,209 to Guice in view of U.S. Patent No. 5,971,086 to Bee et al. Applicant respectfully traverses this rejection. Claims 2, 6, 7, 13, and 14 depend from Claims 1, 5, and 12, respectively, and are thereby submitted to be patentable for the reasons set forth above.

#### Conclusion

For the reasons set forth above, Applicant respectfully submits that Claims 1-10, 12-16, and 19 now stand in formal condition for allowance and should be advanced to issue. The

Examiner is invited to contact by telephone Taras P. Bemko, attorney of record for Applicant, at 713-355-4200, if the Examiner is of the opinion that such a telephone call would serve to expedite these proceedings. Although Applicant believes that no additional fees are required, the Commissioner is hereby respectfully authorized to deduct such fees, as might be required, from Deposit Account Number 13-2166.

Respectfully submitted,

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